

CYNTHIA E. RICHMAN (D.C. Bar No.  
492089; *pro hac vice*)  
crichman@gibsondunn.com  
VICTORIA C. GRANDA (D.C. Bar No.  
1673034; *pro hac vice*)  
vgranda@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

CAELI A. HIGNEY (SBN 268644)  
chigney@gibsondunn.com  
ELI M. LAZARUS (SBN 284082)  
elazarus@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street  
San Francisco, CA 94105  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

DANIEL G. SWANSON (SBN 116556)  
dswanson@gibsondunn.com  
DANA LYNN CRAIG (SBN 251865)  
dcraig@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

*Attorneys for Defendant Apple Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

SOCIÉTÉ DU FIGARO, SAS, a French  
simplified joint-stock company;  
L'ÉQUIPE 24/24 SAS, a French  
simplified joint-stock company, on behalf  
of themselves and all others similarly  
situated; and LE GESTE, a French  
association, on behalf of itself, its  
members, and all others similarly situated,

Plaintiffs,

v.

APPLE INC., a California corporation,  
Defendant.

CASE NO. 4:22-cv-04437-YGR

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANT APPLE INC.  
TO ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT  
PURSUANT TO CIVIL LOCAL RULE  
6-1(A) AND FOR MOTION TO DISMISS  
BRIEFING PURSUANT TO CIVIL  
LOCAL RULE 6-2(A)**

\_\_\_\_\_  
The Honorable Yvonne Gonzalez Rogers

1 Plaintiffs Société du Figaro, SAS, L'Équipe 24/24 SAS, and le GESTE (collectively,  
2 "Plaintiffs") and Defendant Apple Inc. ("Apple"), by and through their respective attorneys of  
3 record herein and without waiving any rights, claims, or defenses they may have in this action,  
4 enter into this Stipulation pursuant to Civil Local Rules 6-1(a) and 6-2(a), with reference to the  
5 following circumstances:

6 WHEREAS, Plaintiffs filed their Class Action Complaint ("Complaint") on August 1,  
7 2022;

8 WHEREAS, Apple was served with the Complaint on August 8, 2022;

9 WHEREAS, absent an extension, Apple's deadline to answer or otherwise respond to the  
10 complaint was August 29, 2022;

11 WHEREAS, absent an extension, Plaintiffs' opposition to any motion to dismiss would be  
12 due 14 days after the motion is filed, and Apple's reply in support of any motion to dismiss would  
13 be due 7 days after the opposition filing deadline, *see* N.D. Cal. Civil L.R. 7-3(a) & (c);

14 WHEREAS, on September 2, 2022, the Court granted Plaintiffs' motion, pursuant to N.D.  
15 Cal. Civil L.R. 3-12(a), to relate this action to *In re Apple iPhone Antitrust Litigation*, N.D. Cal.  
16 No. 4:11-cv-06714-YGR, which Apple did not oppose;

17 WHEREAS, on September 6, 2022, this action was reassigned to District Judge Yvonne  
18 Gonzalez Rogers;

19 WHEREAS, the Parties, out of an abundance of caution, refile this Stipulation, previously  
20 filed on August 23, 2022 with District Judge Haywood Gilliam, in light of the reassignment;

21 WHEREAS, the Parties have met and conferred and Plaintiffs have agreed to extend  
22 Apple's August 29, 2022 deadline until October 28, 2022 in light of competing deadlines;

23 WHEREAS, the Parties also agreed to extend Plaintiffs' deadline to oppose any motion to  
24 dismiss filed by Apple to December 16, 2022 and the deadline for Apple to file a reply in support  
25 of any motion to dismiss to January 10, 2023 in light of competing deadlines;

26 WHEREAS, such an extension will not alter any event or deadline already fixed by Court  
27 order;



**ECF SIGNATURE ATTESTATION**

In accordance with Local Rule 5-1, the filer of this document hereby attests that the concurrence of the filing of this document has been obtained from the other signatories hereto.

Dated: September 9, 2022

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Caeli A. Higney

Caeli A. Higney

Attorneys for Defendant Apple Inc.